

SPREAD

TELECOMMUNICATIONS

February 19, 2015

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Special Access Data Collection, WC Docket No. 05-25, RM-10593

Dear Secretary Dortch:

In response to the Federal Communications Commission's Special Access Data Collection, Spread Telecommunications, LLC ("Spread"), has submitted its responses to the applicable questions via the Commission's Special Access Web Portal. Spread has submitted these responses on behalf of itself and the affiliates identified in response to Question II.A.1.

Pursuant paragraph 3 of the Protective Order adopted in this proceeding¹, the information submitted by Spread in the data container constitutes Highly Confidential information as defined by the Protective Order.

Any questions relating to the enclosed materials may be directed to the undersigned.

Respectfully submitted,



Bruce Deer
Chief Administrative Officer

¹ *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corp. Petition for Rulemaking to Reform Regulations of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593, Order and Data Collection Protective Order, 29 FCC Rcd 11657 (2014) ("Protective Order.").

CERTIFICATION

I have examined the responses and certify that, to the best of my knowledge, all statements of fact, data, and information contained therein are true and correct.

Signature: /s/ Bruce Deer

Printed Name: Bruce Deer

Title: Chief Administrative Officer

Date: 2/25/15

CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25 BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION

REDACTED –
FOR PUBLIC INSPECTION

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC

Explanatory Statement – Competitive Provider Questions



Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.A.5

Question: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response: Not applicable. See Explanatory Statement.

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Response of Spread Telecommunications, LLC
Question II.A.8.

Question: Explain your business rule(s) used to determine whether to build a Connection to a particular Location. Provide underlying assumptions.

- a. Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.
- b. Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.
- c. In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response: Not applicable. See Explanatory Statement.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.A.10

Question: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response: Not applicable. See Explanatory Statement.

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Response of Spread Telecommunications, LLC
Question II.A.11 Part 2

Optional Question: In addition, identify the five largest RFPs (by number of connections) for which you submitted an unsuccessful competitive bid in 2013 for each of (a) Dedicated Services; (b) Best Efforts Business Broadband Internet Access Services; and, to the extent different from (a) or (b), (c) some other form of high-capacity data services to business customers.[2] For each RFP identified, provide a description of the RFP, the area covered, the price offered, and other competitively relevant information. Lastly, identify the business rules you rely upon to determine whether to submit a bid in response to an RFP.

Response: Not applicable. See Explanatory Statement.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.A.18.

Question: If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response: Not applicable. See Explanatory Statement.

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WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.A.19**

Question: Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

Response: Not applicable. See Explanatory Statement.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.D.1.

Question: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: Not applicable. See Explanatory Statement.

Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of Spread Telecommunications, LLC
Question II.D.2.

Question: Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response: Not applicable. See Explanatory Statement.